

1 Mark S. O'Connor (011029) – mark.oconnor@beusgilbert.com
2 Beus Gilbert McGroder PLLC
3 701 N. 44th Street
4 Phoenix, Arizona 85008
480-429-3019
Co-Lead and Liaison Counsel to Common Benefit Fee and Cost Committee

5 Howard Nations – nations@howardnations.com
(TX 14823000; admitted *pro hac vice*)
6 Howard Nations Law
9703 Richmond, Suite 200
7 Houston, Texas 77042
713-807-8400
8 *Co-Chair Common Benefit Fee and Cost Committee*

9 Wendy Fleishman – wfleishman@lhcb.com
(NY 2500429; admitted *pro hac vice*)
10 Lieff Cabraser Heimann & Bernstein
250 Hudson Street, 8th Floor
11 New York, NY 10013
212-355-9500
12 *Co-Chair Common Benefit Fee and Cost Committee*

13 UNITED STATES DISTRICT COURT

14 DISTRICT OF ARIZONA

15 In Re Bard IVC Filters Products
16 Liability Litigation

No. MD-15-02641-PHX-DGC

MOTION TO FILE UNDER SEAL

(Filed *Ex Parte*)

19 Plaintiffs' Co-Lead Counsel and Liaison Counsel to the Common Benefit Fee and
20 Cost Committee and the Co-Chairs of the Common Benefit Fee and Cost Committee
21 respectfully move this Court, pursuant to Federal Rule of Civil Procedure 26(c)(1)(G) and
22 Local Civil Rule 5.6 for leave to file under seal Motion to Unseal for Limited Purpose
23 ("Motion").

24 The Motion pertains to a confidential hearing concerning information relevant to
25 all fee applicants. Furthermore, as the Court is undoubtedly aware, all filings related to the
26 Common Benefit Fee and Cost Committee have been filed under seal in this litigation.
27 Accordingly, good cause exists for sealing the Motion.
28

RESPECTFULLY SUBMITTED this 24th day of September 2021.

BEUS GILBERT MCGRODER PLLC

By: /s/ Mark S. O'Connor

Mark S. O'Connor

701 N. 44th Street

Phoenix, Arizona 85008

*Co-Lead Counsel for Plaintiffs/Liaison Counsel
to the Common Benefit Fee and Cost Committee*

HOWARD NATIONS LAW

Howard Nations (TX Bar No. 14823000)

(admitted *pro hac vice*)

9703 Richmond, Suite 200

Houston, Texas 77042

713-807-8400

*Co-Chair, Common Benefit Fee and Cost
Committee*

LIEFF CABRASER HEIMANN &
BERNSTIEN

Wendy Fleishman (NY Bar No. 2500429)

(admitted *pro hac vice*)

250 Hudson Street, 8th Floor

New York, NY 10013

212-355-9500

*Co-Chair, Common Benefit Fee and Cost
Committee*

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of September 2021, I electronically transmitted the attached document to the Court.

/s/ Jessica Gallentine